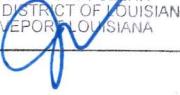


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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 5:18-cr-00252

VERSUS

(01) BRANT R. LANDRY,
(02) MIKE MOSURA, and,
(03) JULIE LANDRY

Judge Foote

MAGISTRATE JUDGE HORNSBY

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
Conspiracy
21 U.S.C. §§ 841(a)(1) and 846

Beginning on a date unknown, but at least by on or about January 1, 2016, and continuing through to on or about May 22, 2018, in the Western District of Louisiana and elsewhere, the defendants, BRANT R. LANDRY, MIKE MOSURA, JULIE LANDRY, and other persons known and unknown to the Grand Jury, did knowingly and intentionally conspire and agree together to distribute and to possess with the intent to distribute anabolic steroids, a Schedule III controlled substance, without lawful authority, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.[21 U.S.C. §§ 841(a)(1) and 846].

COUNT 2

Possession with Intent to Distribute Anabolic Steroids
21 U.S.C. § 841(a)(1)

On or about May 22, 2018, in the Western District of Louisiana, the defendant, BRANT R. LANDRY, did knowingly and intentionally possess with intent to distribute anabolic steroids, a Schedule III controlled substance, without lawful authority, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

COUNT 3

Manufacture Anabolic Steroids
21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2

Beginning on a date unknown, but at least by on or about January 1, 2016, and continuing through to on or about May 22, 2018, the defendant, BRANT R. LANDRY did knowingly and intentionally manufacture anabolic steroids, a Schedule III controlled substance, without lawful authority, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

COUNT 4

Possession of a Firearm in Relation to a Drug Trafficking Offense
18 U.S.C. § 924(c)

On or about May 22, 2018, in the Western District of Louisiana, the defendant, BRANT R. LANDRY, did knowingly possess a firearm, to wit: a (1) Ruger, (2) High Point Rifle, (3) Remington 870 Shotgun, (4) DPMS AR-15 Rifle, (5) Taurus Firearm, and (6) Sig Sauer Firearm in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Possession with Intent to Distribute Anabolic Steroids, as alleged in Count 2, all in violation of Title 18, United States

United States Code, Section 924(c)(1)(A). [18 U.S.C. § 924(c)(1)(A)]

COUNT 5
Misprision of a Felony
18 U.S.C. § 4

On or about May 22, 2018, in the Western District of Louisiana, and elsewhere, the Defendant, JULIE LANDRY, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, Possession with Intent to Distribute Anabolic Steroids pursuant to Title 21 United States Code, Section 841(a)(1), did conceal the same by causing anabolic steroids to be removed from a residence in anticipation that said residence would be searched by law enforcement, and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, all in violation of Title 18, United States Code, Section 4. [18 U.S.C. § 4]

FORFEITURE NOTICE

The allegations in all counts are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A. Upon conviction of the controlled substances and firearms offenses alleged and set forth above of this Indictment, the defendants, BRANT R. LANDRY MIKE MOSURA, and JULIE LANDRY, shall forfeit to the United States all of their interest in:

1. Any property consisting or derived from proceeds the defendants

obtained directly or indirectly as the result of said violations as set forth in this Indictment, which include the specific amounts set forth below; and,

2. Any property including firearms used or intended to be used in any manner or part to commit or facilitate the commission of the aforementioned violations.

B. By virtue of the offenses charged in this indictment, any and all interest in the above-described property is vested in the United States and is forfeited to the United States pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

C. The property referred to in paragraphs A and B above includes, but is not limited to, the following:

- (1) a Ruger;
- (2) High Point Rifle;
- (3) Remington 870 Shotgun;
- (4) DPMS AR-15 Rifle;
- (5) Taurus Firearm; and
- (6) Sig Sauer Firearm

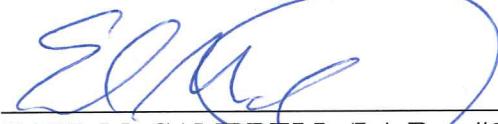
All in accordance with Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL:

REDACTED

~~GRAND JURY FOREPERSON~~

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